GE Industrial Systems

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April 23, 2003

Ms. Kedari Reddy, Assistant Regional Counsel
Office of Regional Counsel – Region II
U.S. Environmental Protection Agency
290 Broadway, 17th Floor
New York, NY 10007-1866

RE: Lower Passaic River Study Area – 104(e) Request for Information

Dear Ms. Reddy,

This letter is in response to the § 104(e) Request for Information dated February 27, 2003, from Raymond J. Basso, Strategic Integration Manager, Emergency and Remedial Response Division, Environmental Protection Agency ("EPA") directed to The General Electric Company ("GE") relating to the above-referenced Site (the "Request"). For clarification, the initial due date was extended to April 25th in a phone conversation with Ms. Reddy on April 17th, 2003. Further, it is understood that although the request references the Lower Passaic River Study Area (the "Site"), this response is limited to information regarding the former GE facility located at 20-01 Wagaraw Road, Fair Lawn, New Jersey (the "Facility").

In response to the Request, GE undertook an extensive search of all reasonably available information relating to the Facility. That search included a review of all reasonably available documents contained in GE's document repository. In addition, GE attempted interviews of reasonably available employees familiar with the Facility. GE submits the attached information based upon its review and evaluation of all of this information.

With regard to the Request itself, GE finds it necessary to note that the scope and breadth of the Request is quite broad in that it seeks information that is not relevant to legislative purposes and outside the scope of EPA's authority. For example, GE objects to questions seeking information concerning offsite locations where wastes from the former GE Facility may have been sent for disposal, which have no relevance to the EPA's investigation of the Site. Therefore, GE believes that portions of the Request are overly broad, burdensome and otherwise may not be in accordance with law. GE has

responded only to those questions or portions of questions relating to or which could reasonably be expected to provide relevant information regarding activities at the Site.

Please be advised that, although GE conducted a diligent and good faith review of all reasonably available records and information in responding to this Request, its efforts were necessarily constrained by the following facts:

1. The Request relates to information and documents that are decades old and much of the information is not reasonably available;

2. GE has not operated the facility since 1981 and few records would have been retained;

3. GE's record retention policies would indicate that most records would have been destroyed.

4. Many of the key employees who would be expected to have information responsive to the Request are deceased or otherwise not reasonably available.

Notwithstanding the above limitations, GE has made a good faith effort to respond to the Request and the information submitted is all that is reasonably available to the best of GE's knowledge.

GE hereby submits the following responses without admitting any liability for conditions at the Site or Facility and without waiving and defenses it may have for liability or costs incurred at the Site or Facility under law. Finally, GE reserves the right to supplement this response if and when additional relevant and responsive information becomes available.

Please do not hesitate to call me at (860)-747-7146 if you have any further questions. We would welcome the opportunity to discuss this information.

Very truly yours,

William M. Feltovic
Manager and Counsel
GE Industrial Systems

Enclosures

Introduction

The following is the response to the information request dated February 27, 2003 from USEPA Region II, received via certified mail. This response is being submitted by GE Industrial Systems on behalf of General Electric Company (GE) since a portion of the facility referenced in the information request was previously operated by GE Motors, a predecessor business component of GE Industrial Systems.

Site Address and Ownership Clarification

The information request referenced the GE facility located at 20-01 Wagaraw Road in Fair Lawn, New Jersey. However, the actual address for the GE operation was 20-21 Wagaraw Road. Based on the historical file information, GE leased only a portion of the commercial/industrial complex at 20-21 Wagaraw. The file information indicates that GE leased the building(s) but never owned property or buildings. Several file references identify other, non-GE operations located in this complex, including operations that included bulk fuel oil storage and other unspecified industrial activity.

It is not known if GE businesses other than GE Motors and/or its predecessor components operated at the Facility. GE Motors sold the New Jersey manufacturing operations to Amtech, Inc. in 1981. The New Jersey operations consisted of the base operation located in Paterson, NJ, including property, assets and business, and the Fair Lawn operation, including assets (equipment) and the business; however, all facilities and grounds in Fair Lawn were leased. The lease obligations were transferred to Amtech, Inc. in 1981, and subsequently to another company, Regal-Beloit, Inc. following a declaration of bankruptcy by Amtech.

Response to Questions

The following response information was obtained from information contained in historical business and legal files located at the former business headquarters of GE Motors. The responses are based solely on the information contained in the referenced files. The number that corresponds to the original question identifies each answer to the respective question. The responses are as follows:

1) GE leased manufacturing space and operated at the Facility from 1961 through 1981.

2)

   a) Yes, USEPA identification number NJD05468572.

   b) No

3) The following substances were documented to have been used, stored and/or disposed of based on limited information provided by material safety data sheets for typical product inventories:

i) Petroleum Hydrocarbons in various forms and formulations;

ii) Polyaromatic Hydrocarbons in the form of:

iii) Grease with paraffinic, naphthenic, aromatic, and heterocyclic hydrocarbons; and,

iv) Mineral Oil composed of severely hydrogenated, naphthenic petroleum distillates;

v) Mineral oil with surfactants and amines

vi) PCB's (in capacitors);

vii) Copper (as a component of bronze);

viii) Iron; and,

ix) Naphtha (as a component of other compounds).

Based on the list of compounds provided, no other substances listed in Question No. 3 were documented to have been used at this Facility. Other substances used at the Facility, but not referenced in Question No. 3 will be discussed in subsequent response questions.

4)

a) This facility was leased from 1961 to 1981 as a satellite facility for the manufacture of gear motor transmissions. During this time, the manufacturing process for these transmissions remained consistent. The processes that were most likely utilized at this facility are described in generalized terms as follows:

Manufacturing Processes

Raw materials used in the manufacture of gear motor transmissions at this facility were limited to aluminum castings, steel bar stock and bronze bushings. Processes used at this facility to convert the above materials into component parts for gear motor transmissions were limited to machining and heat-treating. Assembly, testing and painting of finished gear motor transmissions were performed at Amtech, Inc. (Paterson Gearmotor) located at 845 East 25th Street, Paterson, New Jersey 07513.

Machining and Heat Treating

Aluminum castings used as cases for the gear motor transmissions were machined into their finished configurations for assembly with other finished components. Bronze bushings were inserted in the castings and sized during the machining process.

Steel Bar Stock

Steel bar stock was first cut to size and then machined into gears and shafts. Much of this work was done with the use of water-soluble coolants or cutting oils as lubricants. Upon completion of machining and heat-treating, the finished parts were placed in stock for shipment to the Paterson facility for assembly, testing and painting.

b) Most of the machining was done dry; however, some operations used water-soluble coolants to improve the machining process. The coolants were recycled; aluminum and bronze chips were removed from the coolant during recycling. Scrap metal chips from the machining process were collected in 55-gallon drums and sold to a scrap metal dealer.

Disposal of the scrap metal chips and the water-soluble coolants from steel processing was similar to methods used for the disposal of materials resulting from the machining of aluminum castings.

Cutting oils were reused after filtering of the metal chips; cutting oils were infrequently discarded. Oil lost to the process through adsorption on the steel metal chips was replaced. Metal chips were collected in steel hoppers and sold to a scrap metal dealer. Spent cutting oils were collected on-site for disposal through a contract disposal service.

After machining, approximately fifty percent (50%) of the finished gears and shafts were cleaned in 1,1,1-trichloroethane and then heat-treated in a "carbonitriding" furnace. This furnace contained an inert gas atmosphere and no waste materials were generated. After removal from the furnace, the gears were quenched in oil. Spent 1,1,1-trichloroethane was collected and disposed of through a contract disposal service. Oil in the quenching operation was used repeatedly with infrequent changing or disposal.

Finished shafts were also cleaned in 1,1,1-trichloroethane prior to heat-treating in an induction (electrical) hardening process. This process also used water for quenching. Spent 1,1,1-trichloroethane was collected and disposed of through a contract disposal service.

i) The chemical composition of these substances includes simple hydrocarbon petroleum products, metals, chlorinated solvents and aromatic hydrocarbons. Other than a few examples of MSDS information from the time period in question, there are no other details available on chemical composition of the substances. Available MSDS forms from the time period during the mid-1980's are provided as Attachment 1. This information provides the most detailed information on the potential chemical composition and properties of the substances and/or similar products.

ii) Production information is not available for the period between 1961 and 1981 and therefore the waste to product ratios are not able to be determined.

iii) Little or no information is available that addresses waste handling and segregation practices prior to 1980. Attachment 2 provides a historical summary table of waste generation and disposal vendors utilized by the GE Fair Lawn, NJ Facility as recorded during a 1980 compliance audit. This information provides the most complete accounting of waste generation and disposal vendors for this period of time. The segregation of wastes during this time-frame is clearly set up to accommodate efficient and segregated handling, transportation and disposal for each waste type based on the intended disposal/recycling facility.

Handling and disposal procedures for articles, such as PCB capacitors, was set up in a strict manner to prevent combining such waste material with other waste types. According to a 1981 Pollution Incident Prevention Plan, presented as Attachment 3, PCB articles were managed in a manner to prevent mixing or accidental release.

5) Records and procedures regarding the collection, storage and disposal of waste material and hazardous substances were not found for operating periods prior to 1980. As referenced previously, Attachment 2 provides historical disposal information and Attachment 3 provides details on certain historical handling practices. Additionally, a facility "Oil Spill Prevention Control and Countermeasure Plan" (SPCC Plan) dated March 20, 1981, is presented as Attachment 4. Although intended to address spill procedures, this document provides details on the handling procedures, storage location and storage units in use at the Fair Lawn facility during the referenced time frame.

a) Attachment 3 provides the names and titles of various individuals who had managerial and/or technical responsibilities at the Fair Lawn operation. These

individuals did not likely have direct responsibilities for the arrangement, management, and disposal of hazardous substances; however, these individuals most likely supervised those activities. In particular, Mr. Edward Speranza, Manufacturing Engineer for the GE Fair Lawn operations, had environmental and waste management practice responsibilities. Based on the available documents, Mr. Speranza appears to have been a lead individual regarding the environmental and waste management practices employed at the Fair Lawn Facility.

In addition to the individuals listed in the above referenced document, the following individuals may have knowledge of the waste handling and/or disposal practices employed at the GE Fair Lawn Facility:

Mr. Donald W. Morhman (personal address unknown)
Manager of Environmental Programs (former)

Mr. Donald D. Foster (personal address unknown)
Administrator, Environmental Protection
GE Motors (former business name)
1635 Broadway
Fort Wayne, IN 46802

b) Available information regarding the historical transporters and disposal facilities utilized by the Fair Lawn Facility was referenced previously in Attachment 2. This information is the only information obtained that identified transporters and disposal facilities for the period during which GE operated at this Facility.

c) Known information on the historical storage practices at the GE Fair Lawn operation is included in Attachments 2, 3 and 4. This information describes some basic storage practices and locations of certain storage areas.

   i) Attachment 4 provides details of waste and process chemical storage areas utilized at the Fair Lawn operation. Refer to pages 6 through 16 of the SPCC Plan for details on the identified storage locations of various process materials located within the facility. Additionally, hazardous waste was reportedly stored in a "caged-in area" inside a building that was curbed to prevent a release from potential spills.

   ii) No information was available regarding the handling and storage practices of empty drums.

d) The historical documents contain some information regarding the filtering of metal shavings from the water-soluble coolants and lubricating oils.

Generally, the coolants and oils were recycled following filtering, or in the case of spent coolants and oils, materials were disposed of via outside disposal companies as referenced previously.

6)

a)

i) A summary of a wastewater audit performed in 1980 is provided in Attachment 2. This provides a brief description of the sanitary and storm water discharges at the facility. Based on the 1980 environmental audit results, there were no process wastewater discharges; only sanitary waste was discharged to the sanitary sewer and storm water run-off was discharged to the storm sewers.

A description of operations conducted several years after GE sold the business to Amtech, Inc. indicated that, unlike during the term of GE operation, process wastewater streams were in existence in the late 1980's. According to the description of the practices and processes in use by Amtech, Inc., non-hazardous water from the induction hardening process quenching operation was discharged to the storm sewer system at the Facility. Non-contact cooling water was also discharged into the storm sewer at the Facility. Spent coolant was infrequently discharged to the storm sewer serving the facility after filtering to remove metals. Sanitary wastes were discharged into the sanitary sewer system for treatment by a POTW. Storm water from the entire complex was discharged via the storm sewers to the Passaic River; however, the run-off originated from several areas of the larger industrial complex and involved operations run by several different companies in addition to Amtech, Inc.

ii) Attachment 2 indicates that during the GE operation at the Facility, there was no process wastewater discharge at this Facility, as referenced in the GE audit summary. The record also implies that sanitary and storm water discharges were segregated.

iii) No information is available regarding wastewater treatment at the Facility.

iv) No information is available regarding specific methods of wastewater disposal at the Facility.

v) No process wastewater analytical results were located regarding the Facility. Note that there were no process wastewater discharges during the term of GE operations at the Facility.

b)

i) According to historical records, only sanitary wastewater was discharged to the sanitary sewer system. In 1988, a contractor for Amtech, Inc. conducted dye testing of the sanitary sewer lines and confirmed that all sanitary lines in fact discharged to the sanitary sewer and then to the public treatment facility.

ii) According to historical records, storm water run-off from the entire industrial complex was discharged to the storm sewers, which discharged to the Passaic River. GE audit records indicate that no process discharges took place into the storm sewer system.

In 1988, contractors for Amtech, Inc. conducted a dye test to confirm discharge points for the existing floor drains. During the period that Amtech, Inc. operated the Facility, records indicate that two floor drains may have received discharge from operations at the Facility. These discharges consisted of non-contact cooling water from heat-treating operations, non-hazardous rinsate form de-burring operation, and non-contact cooling water from the parts washer. The de-burring operation rinsate was reportedly a non-hazardous combination of water and burnishing compounds. The discharge reportedly occurred through pipes installed into the floor. These two drains were confirmed by dye testing to discharge to the Passaic River. Both of these drains were eliminated and plugged with concrete in 1988 according to the contractors decommissioning report.

c)

i) Included as Attachment 5 is a 1988 sketch of the floor plan of the Fair Lawn facility as operations were depicted at that time. Three features are shown on this sketch, labeled as Sump 1, Sump 2 and Storm Sewer. Sump 1 is a 2-foot by 2-foot interior sump with no outlet; at the time it was determined to be intact and structurally sound. Sump 2 is also a 2-foot by 2-foot concrete sump with no outlets; at the time it was also determined to be structurally sound. Sump 2 is located in a walkway area that was a common area for the entire complex. The purpose of the sumps is unknown.

A third feature depicted on the sketch is a storm water sump located in the south parking lot. This sump collected storm water, which was conveyed via the storm sewer to the Passaic River.

There were no lagoons located at the Facility during the term of GE operations. Surface water north of the entire complex drained to Diamond Brook. Prior to 1960, this brook fed Alyea's Pond located on the north boundary of the property. A small culvert led from the pond to the Passaic River. Around approximately 1960, a larger culvert was installed for storm water collection. The culvert reportedly drained the pond and discharged to the Passaic River.

ii) Sump 1, Sump 2, and the storm water catch basin were constructed of concrete and were reported to be in good structural condition.

iii) Not applicable.

iv) No outlets existed for Sump 1 or Sump 2. The common area storm water catch basin discharged to the storm sewer and then to the Passaic River.

d) Included for reference, as Attachment 6, is a site sketch developed in 1988 by OHM on behalf of Amtech, Inc. during the time when the Facility was undergoing cleaning in support of a Negative Declaration required under the New Jersey Environmental Cleanup Responsibility Act (ECRA). The sketch is representative of site drainage conditions at the time of the cleanup; however, site features and structures may have changed over time.

7) Based on the available disposal records presented in Attachment 2, the following representative quantities of waste material were generated and disposed of in 1980. This information represents the only information available regarding waste generation and disposal. The waste description and quantities were as follows (The disposal site for each referenced material is provided in Attachment 2):

i) Soluble Oil; Five drums (55 gallon capacity each) annually

ii) Hydraulic and lubricating oil: Two drums (55 gallons capacity each) annually

iii) Solvent (1,1,1-trichloroethane): 24 drums (55 gallon capacity each) annually

iv) Paint and paint sludge: Two drums (55 gallon capacity each) annually

v) Grinding sludge: 1.5 cubic yards per year

vi) Black grease: Two drums (assumed 20 gallon capacity each)

b) No documentation exists indicating that any of the referenced materials were disposed of by GE by any means other than the disposal vendors listed in Attachment 2.

8) There is no documentation or reports of spills or releases that took place at this Facility.

a) Not applicable, no sampling results were determined to exist.

9)

a) No history of flooding was reported.

b) Not applicable.

10) This information is not available to the individual(s) preparing this report. This question is likely unduly broad and general.

11) The only available information or documentation responsive to this question was generated by contractors for Amtech, Inc. during the Facility decommissioning and remediation conducted in 1988 by OHM. Attachment 7 provides the complete report of the remedial activities (waste generation) and the resulting transportation and disposal of the industrial cleaning residuals. Note that this was conducted after the GE operations at the Facility ceased.

12) No sampling data or information was located regarding soil, groundwater or other environmental media other than as provided in Attachment 7.

13)

a) GE leased a portion of the industrial complex identified as 20-21 Wagaraw Road from 1961 through 1981. GE never owned the property.

b) GE leased a portion of the property in question from Fair Lawn Industries, Inc. from 1961 through 1981.

c) The following information provides the understood transition of ownership for the Fair Lawn, NJ property. The site in this instance represents a larger parcel than the portion leased by GE.

The property history as understood by GE is as follows:

Property Ownership and Leasing History
20-21 Wagaraw Road
Fair Lawn, NJ

Name	Owner/Operator	From / To	Address at Time
Curtis Wright Inc.	Both	Pre 1940 to1946	1200 Wall Street West Lyndhurst, NJ 07071
Fair Lawn Industries, Inc.	Owner	1946 - 1982	No Longer in Business
Fair Lawn Industries, Ltd.	Owner	1982 - Unknown	39 Avenue C.P.O. Box 8 Bayonne, NJ
Einson-Freeman Inc.	Operator	1947 - 1961	Successor Company 20-10 Maple Ave. Fair Lawn, NJ
General Electric Co.	Operator	1961 - 1981	P.O. Box 2204 Ft. Wayne, IN 46801
Amtech, Inc.	Operator	1981 - 1987	845 E. 25th St. 1987 Paterson, NJ 07513
Regal-Beloit, Inc.	Operator	1987 - Unknown	P.O. Box 38 South Beloit, IL 61080

Curtis Wright, Inc. owned and operated the property occupied by the Facility from 1940 to 1946. There is no available information regarding the nature of its operations at the facility. From 1947 to 1961, Einson-Freeman, Inc., printers and lithographers, manufactured point-of-purchase displays. The successor company was Einson, Freeman & Detroy Corporation. GE had no relationship with any of these companies.

GE involvement at the Facility began with Fair Lawn Industries, Inc. (Ltd.) and was limited to the leasing of the Facility by GE from Fair Lawn. GE subsequently sold the Paterson Gearmotor business (operating in Paterson, NJ and Fair Lawn, NJ) to Amtech, Inc. and the lease agreement was transferred to Amtech, Inc. The assets and operation of Amtech, Inc. were transferred to Regal-Beloit Corporation in November of 1987. GE had and has no relationship with Regal-Beloit Corporation.

14)

a) General Electric Company
d/b/a GE Industrial Systems
f/k/a GE Industrial Control Systems
f/k/a GE Motors and Industrial Controls
f/k/a GE Motors

b) Mr. Jeffrey Immelt
Chairman and Chief Executive Officer
General Electric Company
3135 Easton Turnpike
Fairfield, CT 06431

c) GE operates in more than 100 countries and employs more than 300,000 people worldwide.

d) The General Electric Company is incorporated in the State of New York. The agents for service of process are:

New York	New Jersey
The General Electric Company	The Corporation Trust Company
3135 Easton Turnpike	820 Bear Tavern Road
Fairfield, CT 06430-5163	West Trenton, NJ 08628

e) through j) See Attachment 8, "General Electric Annual Report 2002".

15) This response was prepared by Larry G. Reynolds, former Manager of Remediation Programs for GE Motors, working under subcontract to GE Industrial Systems. The information used to develop this response was obtained from the technical and legal files located at the former business headquarters of GE Motors. This response was prepared based on a review of documents and correspondence located in the referenced files. Attempts to contact previous employees were unsuccessful.

The following current employees of GE Industrial Systems were consulted regarding information and document search efforts regarding the preparation of this response:

Debby Berg – Global Environmental Manager
Brenda Werling – Legal Secretary
Cindy Grimes – Product and Process Material Chemist

Contact information:	File Location:
Larry G. Reynolds	GE Industrial Systems
SES Environmental	1635 Broadway
3897 Transportation Drive	Fort Wayne, IN 46802
Fort Wayne, IN 46818	(260) 439-2000
(260) 497-7645	

The contact information listed above is provided in response to the questions. All correspondence with GE on this matter should be directed to Mr. William M. Feltovic at the contact information provided on the cover letter of this submission.

Under the direction of Sarah Flanagan, ORC and Robert Keating, Records Center Manager, attachments were not scanned. Also Notice Letters were not issued to this PRP.

General Electric/GE Industrial Systems

DIAMOND ALKALI SUPERFUND SITE

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